

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

DALONTE WHITE)	CASE NO. 1:17 CV 1165
)	
Plaintiff,)	JUDGE PAMELA A. BARKER
)	
v.)	MAGISTRATE JUDGE GREENBERG
)	
CITY OF CLEVELAND, et al.,)	DECLARATION OF ERNEST L.
)	WILKERSON, JR.
Defendants.)	

1. I am an adult who is competent to make this declaration pursuant to 28 U.S.C.A. § 1746 and I have first-hand knowledge of the facts set forth herein.

2. I am an attorney duly admitted to the practice of law in the State of Ohio. I have been in practice since 1986 and have no disciplinary history. I am one of the counsel of record for Defendant David Lam in the above-captioned case.

3. At no time did I harass, oppress, intimidate, bother, threaten, tamper with or interfere with any witness in this case, including Colleen Allums. In fact, I have never talked to Ms. Allums.

4. Neither I nor any other person associated in any way with Defendant Lam or Wilkerson & Associates Co., LPA, to my knowledge, has ever asked, hinted, suggested, directed, condoned, approved of, knew about, sanctioned, or authorized, that any other person, including but not limited to individual defendants in this case or any present or former member of the Cleveland Division of Police, intimidate Colleen Allums or tamper with her as a witness in any way.

5. I am not aware of any facts or circumstances that would tend to support in any way the accusations about witness intimidation in the Declaration of Brian Bardwell filed on June 2, 2020.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on
June 3, 2020.



Signed, ERNEST L. WILKERSON, JR. (#0036972)